

Exhibit B

Declaration of John Hurry

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10 *Attorneys for Petitioners*

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 IN THE MATTER OF THE

14 PEE PEE POP TRUST, PEE PEE POP
15 TRUST II, PEE PEE POP TRUST III, MAN
16 CUB TRUST, MAN CUB TRUST II, MAN
17 CUB TRUST III, DATED JULY 22, 2013.

Case No. 3:19-cv-00240-MMD-CBC

**DECLARATION OF JOHN HURRY IN
SUPPORT OF MOTION FOR
TEMPORARY RESTRAINING
ORDER AND PRELIMINARY
INJUNCTION**

18 I, John Hurry under penalty of perjury under the laws of Nevada and California state as
19 follows;

20 1. I am the trustee of the Pee Pee Pop Trust, Pee Pee Pop Trust II, Pee Pee Pop Trust
21 III, Man Cub Trust, Man Cub Trust II and Man Cub Trust III (collectively the Trusts).

22 2. I make this Declaration in Support of the Motion for Temporary Restraining Order
23 and Preliminary Injunction (Motion).

24 3. I have read and am familiar with the Motion as well as the Petition to Assume
25 Jurisdiction of the Trusts filed in state court and removed to Federal court and state that the factual
26 averments set forth in said Motion and Petition are true of my own personal knowledge except as
27 to such matters that by expression or context are based on information or belief, and as to those I
28 affirm that I believe them to be true.

4. On Thursday, August 15, 2019, FINRA issued an order suspending the membership
interests in FINRA of Petitioners Alpine Securities Corporation (Alpine) and Scottsdale Capital
Advisors Corporation (Scottsdale).

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1 5. Without current membership interests in good standing with FINRA, both Alpine
2 and Scottsdale are unable to do business and are unable to transact business for or on behalf of their
3 customers, including consummating transactions or liquidating accounts, thereby exposing such
4 third parties to harm and damage.

5 6. The suspension of their ability to transact business and suspension of their licenses,
6 has resulted in catastrophic loss of business and reputation to both Alpine and Scottsdale which
7 loss continues on a daily basis while they are unable to transact business. Such loss cannot be
8 adequately measured nor can it ever be recovered.

9 7. I have provided trust certificates to FINRA establishing the existence, ownership,
10 operation and control of the Trusts under Nevada law. Those certificates are included in the Petition
11 the Trusts filed in state court that are now removed to federal court and are in the file, together with
12 Continued Membership Applications for the Trusts.

13 8. The six Trusts have the same Settlers, Trustees, Beneficiaries and Operating
14 Provisions as the two Hurry Family Trusts that formerly owned the two holding companies that
15 they formerly owned, and that the six trusts now own. There has been no change in ownership
16 through any change in trustees, beneficiaries or operating provisions and these are confirmed in the
17 Certificates of Trust filed with the Removed Petition.

18 9. It is my understanding that the memberships of Alpine and Scottsdale were
19 suspended for failure of the trustees to provide full and complete copies of the trust instruments
20 instead of Trust Certifications as permitted by Nevada law.

21 10. My trusts are highly confidential and sensitive testamentary documents outlining
22 the manner in which the trust assets will be distributed to my heirs and legatees after my death.
23 During my life, my wife and I operate and control all aspects of the trust and its assets just as though
24 we owned the assets in fee and exactly in the same manner as the former two trusts.

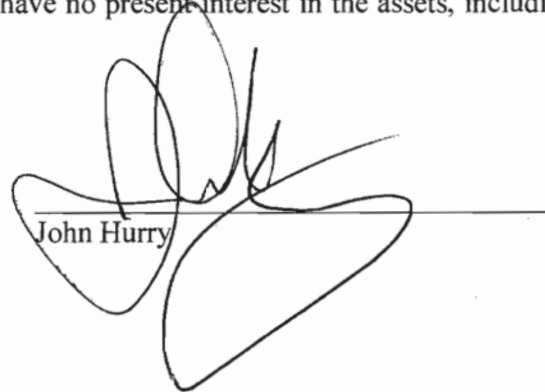
25 11. Scottsdale has been a member of FINRA since 2002. Alpine has been a member of
26 FINRA since 1984. Alpine has been owned by SCA Clearing LLC since 2011. I formerly owned
27 SCA Clearing, but have since put the ownership of SCA Clearing equally in the six trusts, as to
28 which I am the lifetime and income beneficiary and exercise the same control over SCA Clearing

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1 as I always did. My wife and I own the entire present legal and beneficial interest in SCA Clearing
 2 until my death at which time the legal and beneficial interests will be distributed pursuant to the
 3 testamentary provisions of the trusts. The same holds true of Scottsdale Capital Advisors Holdings
 4 LLC ("SCA Holdings") formerly owned by my wife, and now by the six trusts in equal shares.

5 12. The transfer of the legal interests from my wife and I to the Trusts and the future
 6 beneficial interests in SCA Clearing and SCA Holdings to the remainder beneficiaries under the
 7 Trusts effected no current or present change in the operation or control or ownership of either SCA
 8 Holdings or SCA Clearing, as my wife and I, as individual trustees have the legal ownership of the
 9 entities in trust or as fiduciaries for ourselves, as beneficial owners until our death. The legal and
 10 equitable ownership is effectively merged in ourselves as both trustees and life beneficiaries, with
 11 the only change pertaining to distribution of the future interest (remainder interest) on our death.
 12 The remainder beneficiaries are entirely contingent remainder beneficiaries as I have the right to
 13 amend the trusts at any time, and they therefore have no present interest in the assets, including,
 14 SCA Clearing and SCA Holdings.



John Hurry

4850-0090-9217